

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN FEDERATION OF  
TEACHERS, AFL-CIO; UNITED  
FEDERATION OF TEACHERS; SERVICE  
EMPLOYEES INTERNATIONAL UNION,  
AFL-CIO; SEIU HEALTHCARE  
MINNESOTA & IOWA; SEIU  
COMMITTEE OF INTERNS AND  
RESIDENTS; UNITED FOOD AND  
COMMERCIAL WORKERS  
INTERNATIONAL UNION, AFL-CIO;  
UFCW LOCAL 135; UFCW LOCAL 2013;  
INTERNATIONAL ASSOCIATION OF  
MACHINISTS AND AEROSPACE  
WORKERS, AFL-CIO; IAM DISTRICT  
160; AMERICAN FEDERATION OF  
STATE, COUNTY & MUNICIPAL  
EMPLOYEES, AFL-CIO; AFSCME  
COUNCIL 31; UNITED NURSES  
ASSOCIATIONS OF CALIFORNIA/UNION  
OF HEALTH CARE PROFESSIONALS;  
AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, AFL-CIO  
and AMERICAN FEDERATION OF  
LABOR AND CONGRESS OF  
INDUSTRIAL ORGANIZATIONS,

PLAINTIFFS,

v.

GREGORY GOLDSTEIN, in his official  
capacity as Acting Director of the Federal  
Mediation and Conciliation Service;  
FEDERAL MEDIATION AND  
CONCILIATION SERVICE; UNITED  
STATES OF AMERICA; UNITED STATES  
OFFICE OF MANAGEMENT AND  
BUDGET; and RUSSELL T. VOUGHT, in  
his official capacity as the Director of the  
Office of Management and Budget,

DEFENDANTS.

Case No.: 1:25-cv-03072-AS

**SUPPLEMENTAL DECLARATION OF  
JOE GUZYNSKI**

SUPPLEMENTAL DECLARATION OF JOE GUZYNSKI

1. My name is Joe Guzynski. I am over the age of 18 and make this declaration based on my personal knowledge.
2. I previously filed a declaration in this case explaining that FMCS planned to assign three mediators who would be present throughout the bargaining at the UNAC/UHCP national negotiations with Kaiser, which began on May 5, 2025.
3. Those mediators received RIF notices at some point in March or April 2025, so they could not attend the May 2025 negotiations in their capacity as FMCS mediators. However, because we believed that they would be tremendously helpful in negotiations, the bargaining parties privately paid the three mediators to attend negotiations in May 2025.

I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in cursive script that reads "Joe Guzynski".

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Joe Guzynski

Dated: June 9, 2025